

FILED
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CLERK OF DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM T. KOCH,

Defendant.

INDICTMENT

Case No.

Judge

Title 18, Sections 875(d), 1028(a)(7),
2251(a) and (e), and 2252A(a)(3)(B)(ii),
United States Code

1:13CR070
JUDGE ADAMS

GENERAL BACKGROUND

At all times relevant to this Indictment:

1. Minor # 1 refers to a male child, whose identity is known to the grand jury and who was born in 1997.
2. Minor # 2 refers to a male child, whose identity is known to the grand jury and who was born in 1998.
3. Minor # 3 refers to a male child, whose identity is known to the grand jury and who was born in 1997.
4. Minor # 4 refers to a male child, whose identity is known to the grand jury and who was born in 1997.

5. Minor # 5 refers to a male child, whose identity is known to the grand jury and who was born in 1999.

COUNT 1

The Grand Jury charges:

From on or about December 19, 2010, through on or about December 20, 2010, in the Northern District of Ohio, Eastern Division and elsewhere, defendant, WILLIAM T. KOCH, did attempt to coerce a minor, Minor # 1, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and knowing and having reason to know that such visual depiction would be transmitted, using any means or facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 2

The Grand Jury further charges:

On or about June 24, 2011, in the Northern District of Ohio, Eastern Division and elsewhere, defendant, WILLIAM T. KOCH, did attempt to coerce a minor, Minor # 2, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and knowing and having reason to know that such visual depiction would be transmitted, using any means or facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 3

The Grand Jury further charges:

On or about September 9, 2012, in the Northern District of Ohio, Eastern Division and

elsewhere, defendant, WILLIAM T. KOCH, did use, persuade, induce, entice and coerce a minor, Minor # 3, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of transmitting a live visual depiction of such conduct, and knowing and having reason to know that such visual depiction would be transmitted, using any means or facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 4

The Grand Jury further charges:

On or about September 9, 2012, in the Northern District of Ohio, Eastern Division and elsewhere, defendant, WILLIAM T. KOCH, did distribute, in and affecting interstate and foreign commerce, by computer, any material in a manner that reflected the belief and was intended to cause another to believe that the material was a visual depiction of an actual minor engaging in sexually explicit conduct, in violation of Title 18, United States Code, Section 2252A(a)(3)(B)(ii).

COUNT 5

The Grand Jury further charges:

On or about September 9, 2012, in the Northern District of Ohio, Eastern Division and elsewhere, defendant, WILLIAM T. KOCH, with the intent to extort a thing of value from a person, Minor # 3, did transmit in interstate and foreign commerce, a communication threatening to injure the reputation of Minor # 3, in violation of Title 18, United States Code, Section 875(d).

COUNT 6

The Grand Jury further charges:

On or about September 9, 2012, in the Northern District of Ohio, Eastern Division and elsewhere, defendant, WILLIAM T. KOCH, did attempt to coerce a minor, Minor # 3, to engage

in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), with his ten-year-old brother, for the purpose of transmitting a live visual depiction of such conduct, and knowing and having reason to know that such visual depiction would be transmitted, using any means or facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 7

The Grand Jury further charges:

From on or about August 31, 2012 through on or about September 18, 2012, in the Northern District of Ohio, Eastern Division and elsewhere, defendant, WILLIAM T. KOCH, did attempt to coerce a minor, Minor # 4, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and knowing and having reason to know that such visual depiction would be transmitted, using any means or facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 8

The Grand Jury further charges:

From on or about August 31, 2012 through on or about September 18, 2012, in the Northern District of Ohio, Eastern Division and elsewhere, defendant, WILLIAM T. KOCH, with the intent to extort a thing of value from a person, Minor # 4, did transmit in interstate and foreign commerce, a communication threatening to injure the reputation of Minor # 4, in violation of Title 18, United States Code, Section 875(d).

COUNT 9

The Grand Jury further charges:

From on or about September 4, 2012 through on or about September 13, 2012, in the Northern District of Ohio, Eastern Division and elsewhere, defendant, WILLIAM T. KOCH, did attempt to coerce a minor, Minor # 5, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and knowing and having reason to know that such visual depiction would be transmitted, using any means or facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 10

The Grand Jury further charges:

From on or about September 4, 2012 through on or about September 13, 2012, in the Northern District of Ohio, Eastern Division and elsewhere, defendant, WILLIAM T. KOCH, with the intent to extort a thing of value from a person, Minor # 5, did transmit in interstate and foreign commerce, a communication threatening to injure the reputation of Minor # 5, in violation of Title 18, United States Code, Section 875(d).

COUNT 11

The Grand Jury further charges:

From on or about December 19, 2010, through on or about September 13, 2012, in the Northern District of Ohio, Eastern Division and elsewhere, defendant, WILLIAM T. KOCH, did knowingly use, without lawful authority, in and affecting interstate and foreign commerce, a means of identification of another person, Minor # 1, with the intent to commit, and in

connection with, the offenses charged in Counts One, Seven and Eight of this indictment, in violation of Title 18, United States Code, Sections 1028(a)(7) and (c)(3)(A).

A TRUE BILL.

Original Document - - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.